

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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| In the Matter of |) | |
| |) | |
| Requirements for Digital Television |) | ET Docket No. 05-24 |
| Receiving Capability |) | |
| |) | |

To: The Commission

COMMENTS OF SAMSUNG ELECTRONICS CORPORATION

Samsung Electronics Corporation (SAMSUNG), respectfully submits these comments in support of the Petition for Rulemaking of the Consumer Electronics Association (“CEA”) and the Consumer Electronics Retailers Coalition (“CERC”) requesting that the Commission accelerate the requirement that all television receivers with screen sizes of 25 to 36 inches incorporate DTV tuners to March 1, 2006; and that the Commission eliminate the July 1, 2005 date for 50 percent of such receivers to include DTV tuners (“CEA-CERC Petition”).¹

I. Introduction and Summary:

SAMSUNG is an international organization with its headquarters in Republic of Korea and operating divisions in the US as well as in many countries. As the leading consumer electronics appliances manufacturer, SAMSUNG is leader in innovative solutions for the Digital Television

¹ See Petition of CEA and the CERC, ET Docket No. 05-25, filed on November 5, 2004. The Commission issues an NPRM on February 14, 2005. See In the Matter of Digital Television Tuner Requirements, NPRM, ET Docket No. 05-24, FCC 05-17 (rel. Feb. 14, 2005)

products and has supported the US transition to the digital television supplying various DTV products at affordable prices.

SAMSUNG supports the CEA and the CERS request to the Commission to accelerate to March 1, 2006, its requirement that all television receivers of screen sizes 25-36 inches incorporate digital television tuners (“CEA-CERC Petition”). SAMSUNG agrees with the CEA/CERC proposition. By granting the CEA-CERC Petition, the Commission will expedite the delivery of 100 percent of these popular mid-size televisions receivers equipped with the DTV tuners to the consumers. This would also eliminate potential market-place distortions, which could impede the DTV transition.

**I. Revising Implementation Schedule to March 1, 2006
deadline for all 25-36 inch receivers to include a Digital
Tuner would help the Success of DTV Transition.**

As the CEA/CERC Petition pointed out the 50-percent milestone for 36-inch or larger receivers created retail environment where consumers preferred lower-cost analog receivers to the higher-priced receivers with DTV tuners. Similar consequences should be avoided for implementation schedule for the popular mid-size (25-36 inch) television receivers.

The CEA-CERC petition requests the Commission to 1) eliminate the July 1, 2005 requirement of 50 percent of 25-36 inch television receivers to have DTV reception capability and, 2) advance the date to March 1, 2006 for 100 percent of 25-36 inch receivers to be capable of DTV reception.

SAMSUNG supports both CEA-CERC requests. This would avoid market place disruption and help DTV transition.

Considering various aspects of manufacturing, arranging for volume production and timely delivery of the products to the retailers SAMSUNG believe that advancing the date for 100-percent popular mid-size receivers to have DTV reception capability any sooner than March 1, 2006 is also not realistic. SAMSUNG urges the Commission to adopt March 1, 2006 deadline for all 25-36 inch receivers to include DTV tuner.

In addition, SAMSUNG acknowledges and supports the Commission's intention that there will be no revision to the July 1, 2007 date by which all broadcast receivers to have DTV reception capability.

For these reasons and those set forth in the CEA-CERC Petition, SAMSUNG respectfully requests that the Commission grant the CEA-CERC Petition.

Respectfully submitted,

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